

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of:

Comprehensive Review of Universal Service)	WC Docket No. 05-195
Fund Management, Administration and)	
Oversight)	
)	
Federal-State Joint Board on Universal)	CC Docket No. 96-45
Service)	
)	
Schools and Libraries Universal Service)	CC Docket No. 02-6
Support Mechanism)	
)	
Rural Health Care Support Mechanism)	WC Docket No. 02-60
)	
Lifeline and Link-Up)	WC Docket No. 03-109
)	
Changes to the Board of Directors for the)	CC Docket No. 97-21
National Exchange Carrier Association, Inc.)	

**COMMENTS OF THE WEST VIRGINIA LIBRARY COMMISSION
IN RESPONSE TO NOTICE OF PROPOSED RULEMAKING
AND
FURTHER NOTICE OF PROPOSED RULEMAKING**

The West Virginia Library Commission (WVLC), the state library agency for West Virginia, wishes to add its voice to others in the library community concerning the matters listed above. The Commission supports the position of the American Library Association and will not attempt to repeat ALA's statements. Instead WVLC would like to point to specific issues of the program as they relate to West Virginia.

West Virginia is in the top five of the most rural states in the United States. Technology has become a critical service point in reaching all of our

citizens. WVLC in cooperation with libraries statewide manages a network that provides access to the Internet, library catalogs, and other electronic resources. It does not matter if a library patron enters a library in the state capital or the most rural branch library in the mountains, access is equal. This would not be possible without the E-rate program.

From the inception of the E-rate program WVLC was committed to supporting libraries in compliance. The state library agency completes all the requirements for public libraries and these libraries are at 100% participation in the program for data lines. All but twenty-five of the 172 library facilities in the state have at least a T-1 line. The twenty-five remain on 56k lines. West Virginia remains among the lowest states for the citizen to have Internet access from home. Many of our people with access have only dial-up service. For West Virginians to participate in e-government the public library is the portal of choice with broadband access and the service is free.

The ability to maintain the statewide network is a balance of state and federal funds, grants and the E-rate program. Any disruption in the E-rate program would threaten the ability of the West Virginia Library Commission and the local public libraries to serve our citizens.

As stated by ALA simplification of the program would aid the smaller public libraries in participation in all phases of the E-rate program. Currently many of our smallest, most rural libraries do not apply for

discounts because of the burdensome process. Many of these libraries have only a single staff member. These libraries do not have the luxury of stepping away from serving their patrons to complete forms. This prevents the libraries from applying for the discounts on “voice” lines. Again, 100% of the data lines are included only because the state agency completes all of the requirements for the discounts. It is not possible for the WVLC to complete the voice filing for every public library facility statewide. Therefore the single libraries, when staff and time permit, are completing the process for sometimes minimal reimbursement return. Simplifying the E-Rate filing process will enable all public libraries in West Virginia to once again enjoy the Universal Services Discount Program for which it was originally established. The first two years of the program yielded 100% “voice” reimbursements for public libraries only because the WVLC had the resources to commit a full time staff member to complete the filing for all libraries. State budget cuts and reduction in agency staff no longer permit such a luxury. The number of public libraries participating in E-Rate “voice” filings continues to decline each year because of the continued increase in complexity of the discount program filing process.

In a state such as ours the public library plays a key role in “equal access.” The E-rate program allows every citizen a level playing field. By simplifying the filing process and enabling applicants to once again fully

participate, the libraries will be able to enhance and maintain the services provided to all citizens.

Respectfully submitted,

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